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December 2, 2024

**VIA ECF**

Hon. Miroslav Lovric  
United States District Court  
Northern District of New York  
15 Henry Street  
Binghamton, New York 13901

RE: *Adirondack Trust Company v. Maha Laxmi Corp., et al.*,  
No. 1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric,

As you are aware, this firm represents Defendants in the above-referenced litigation. We write to provide the Court with a detailed status report as ordered at Docket No. 118.

The parties have completed fact discovery in this case in accordance with the discovery schedule set by this Court. Specifically, in October, the parties completed the depositions of Niral Patel, Nirmala Patel, Lyndsey Meilleur-Patel, Edward Connell, Edward Hart, Michael O'Connell, Michael Murray, Natalie Wait, and Charles Wait, Jr. Subsequently, the parties have moved through the next phases of expert discovery. ATC served its supplemental expert disclosure on October 31, 2024. Defendants will serve any supplemental expert disclosures pursuant to the Court ordered deadlines in Docket No. 97.

During the parties' last conference with the Court, Plaintiff Adirondack Trust Company ("ATC") had identified certain edits that were made to ATC's Wikipedia page. ATC believed that Mr. Patel was involved in these revisions, and Defendants maintained that Mr. Patel did not create these revisions, nor did he ask anyone to make these revisions. After the parties' conference with the Court, an individual named Rahul Jain contacted Mr. Buckey and identified himself as the editor of ATC's Wikipedia page and similarly denied that Mr. Patel was in anyway involved with Mr. Jain's edits to ATC's Wikipedia page (Dkt. No. 117-1). Shortly thereafter, Mr. Patel, through counsel, provided ATC with a sworn affidavit similarly denying involvement in the revisions to ATC's Wikipedia page. As of today, Defendants have not been made aware of any subsequent concerns from ATC since the parties' last conference with this Court on October 25, 2024.

The parties continue to move forward in accordance with all deadlines set forth in this Court's June 24, 2024 scheduling order (Dkt. No. 97) and do not anticipate any need for extensions at this time.

Thank you for your attention to this matter.

Respectfully submitted,

*Jennifer M. Yetto*

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